

Alexandria Division

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As noted in the government's prior motion, given the nature of the crimes allegedly committed by these five defendants, there is a large volume of complex discovery in this case. The government has already begun producing to defense counsel voluminous discovery, and the next production, which is imminent, will consist of more than 28,000 documents. It should also be noted that none of the three defendants are currently incarcerated. The government agreed to their pretrial release at their initial appearances.

Therefore, the United States requests that the Court certify the case as unusual and complex and find that the ends of justice served by scheduling a trial beyond the 70-day deadline of the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. The United States further requests that the Court exclude the time from December 9, 2022, until the next status conference, scheduled for February 14, 2023. A proposed order is submitted herewith for the convenience of the Court.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By: /s/ John T. Gibbs
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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2023, I electronically filed this motion with the Clerk of Court using the CM/ECF system, which will transmit a Notice of Electronic Filing to all counsel of record in this case.

/s/ John T. Gibbs

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